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REMARKS

This is in response to the office action mailed March 01, 2006. Claims 1 to 32 are in this application. Claims 1, 27, 29 and 30 are amended as discussed below.

The Rejections

Claims 1, 2, 13-15 and 29 to 30 are rejected under 35 U.S.C. 102(b) as being anticipated by Swapp. Claims 1, 2, 9, 26, 29 and 30 are rejected under 35 U.S.C. 102(b) as being anticipated by Milano.

Claims 16, 18, 19 and 31 are rejected under 35 U.S.C. 103(a) as being unpatentable over Toda in view of Swapp. Claims 20, 21, 22 and 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Brinkerhoff in view of Swapp. Claims 27 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Swapp in view of Ruggles.

It is noted with appreciation that claims 4 to 8, 10 to 12, 17 and 23 to 25 are objected to but would be allowable if appropriately rewritten. However, Applicant submits that the amendments introduced herein overcome the references applied.

For reasons set forth below, it is submitted that the amended claims define patentable subject matter over the references cited

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and applied by the Examiner.

The claim amendments

Claims 1, 27, 29 and 30 are amended to recite that the slats have a pair of side edges and an intermediate portion therebetween and further that the connector portion overlies and connects to the *intermediate portion only* of the slat. This attribute clearly finds no support or disclosure in the references cited and applied, and conveys the importance of a feature of the invention, namely, the ability to retrofit easily an existing shutter without significant modification of the shutter. The patents cited and applied by the Examiner do not disclose this feature.

Brief Comparison of Claimed Invention and References

Swapp connects at the edge of the shutter - see Figures 3 and 5 for example. Milano also connects at the edge of the shutter - see Figure 5 for example. The same can be said for Toda (Figure 2 shows an example) and Brinkerhoff (Figure 5 shows an example).

The claimed invention is designed so as to be capable of connecting to a shutter as an "add on" where the slats or shutter require no structural adaptation at all and can be easily retrofitted with the shutter control device claimed. The claims recite that the connector portion connects to the *intermediate*

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portion only of a slat, and no "invasive" restructuring of the slat is needed to obtain the benefit of the invention. Contrast this situation with the cited patents all of which require specialized slats to effect a connection.

In view of the above, Applicant submits that the amended claims define patentable subject matter, and allowance of all the claims is respectfully solicited. Since it is submitted that the amended claims place the application in order for allowance, the Examiner is requested to enter these claims under 37 CER 1.116(b). The Examiner is requested to note that the amended claims clarify and recite features previously argued in earlier responses, and that it would be appropriate to enter the claims for consideration and allowance.

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If the Examiner has any questions, he is invited to contact the undersigned at (818)710-2788.


Respectfully submitted,



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